



USPTO
Commissioner of Patents
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D. Gabriel Frost
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Re: Application/Control Number 10/766,670 Art Unit 2444

Dear Ms. Cloud and Mr. Vaughn:

We are in receipt of the office actions dated June 23, 2010 and December 23, 2010. We believe the rejection of all claims 1-57 in our application 10/766,670 is in error. We request reconsideration and further examination in light of the arguments listed below.

The bulk of our application is covered under the prior art of Rai (6,377,982). However, the examiner misses an important distinction between Rai and our application.

Where Rai fails to anticipate the current invention is in terms of roaming where there is no roaming agreement provisioned a-priori. Various places in Rai describe interaction with roaming and accounting systems. The most relevant parts are column 16, lines 40-56 and column 35, line 57 through column 36, line 57.

The network access and roaming system contemplated by Rai functions only when there are roaming agreements between the local provider accessed by the user and that user's home network. In column 16, lines 40-45 Rai notes:

In order for this configuration to work, not only must there be roaming agreements between the home and the foreign wireless service providers, but there also must be agreements between the foreign wireless service provider and the end system's internet service provider directly or through an intermediary.

This directly indicates Rai does not contemplate the portion of the current invention that dynamically and automatically negotiates a roaming agreement on a transient basis where one did not previously exist a-priori.